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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

CITY OF RICHMOND AND RICHMOND
JOINT POWERS FINANCING AUTHORITY,

Plaintiffs,

vs.

ROYAL BANK OF CANADA, JPMORGAN
CHASE, PUBLIC RESOURCES ADVISORY
GROUP, AND THE MAJORS GROUP,

Defendants.

CASE NO. 3:25-cv-03348

**JOINT STIPULATION TO EXTEND
TIME FOR DEFENDANTS TO
ANSWER OR RESPOND TO
COMPLAINT TO JULY 21, 2025
PURSUANT TO CIVIL LOCAL RULE
6-1(a)**

Complaint Filed: March 17, 2025

STIPULATION TO EXTEND TIME

Pursuant to Rule 6(b)(1) of the Federal Rules of Civil Procedure and Local Rule 6-1(a) of the Northern District of California Civil Local Rules, Plaintiffs City of Richmond and Richmond Joint Powers Financing Authority (collectively, “Plaintiffs”) and Defendants Royal Bank of Canada, JPMorgan Chase Bank, N.A., and Public Resources Advisory Group (collectively, “Defendants,” and, together with Plaintiffs, “the Parties”), by and through their respective counsel, hereby stipulate as follows:

WHEREAS, on March 17, 2025, Plaintiffs filed their Complaint against Defendants in California Superior Court for the County of Contra Costa (the “State Court Action”);

WHEREAS, on April 15, 2025, Defendants timely removed the State Court Action to this Court;

WHEREAS, the current deadline for Defendants to respond to the Complaint is no earlier than April 22, 2025, pursuant to Federal Rule of Civil Procedure 81(c)(2);

WHEREAS, Plaintiffs have clarified that their reference to Defendant “JPMorgan Chase” in the Complaint is intended to refer to JPMorgan Chase Bank, N.A.;

WHEREAS, the Parties, through their respective counsel, have met and conferred in good faith and have agreed to stipulate to an extension to the Defendants’ deadline to answer or otherwise respond to the Complaint;

WHEREAS, the Parties have agreed to a 90-day extension, which will reset Defendants’ deadline to answer or otherwise respond to the Complaint to July 21, 2025;

WHEREAS, Defendants waive any objection to the absence of a summons or service;

WHEREAS, with the exception of Defendants’ waiver of any objection to the absence of a summons or service, the Parties and each of them expressly reserve and do not waive any arguments or defenses by making this stipulation. Specifically, by entering into this stipulation and seeking the extension requested herein, Defendants reserve and do not waive any rights to challenge the sufficiency of the Complaint; and

1 WHEREAS, the 90-day extension of Defendants' deadline to answer or otherwise
2 respond to the Complaint will not alter the date of any event or any deadline already fixed by
3 the Court;

4 NOW, THEREFORE, the Parties stipulate as follows:

5 Pursuant to Civil Local Rule 6-1(a), the deadline for Defendants to answer, move, or
6 otherwise respond to the Complaint is extended to and including July 21, 2025.

7 **IT IS SO STIPULATED.**

8 DATED: April 21, 2025

KELLER ROHRBACK L.L.P.

9
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Matthew S. Melamed

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21 *Attorneys for Plaintiffs City of Richmond*
22 *and Richmond Joint Powers Financing*
Authority

23 DATED: April 21, 2025

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28 *Attorneys for Defendant Public*
Resources Advisory Group

1 DATED: April 21, 2025

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13 DATED: April 21, 2025

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SIGNATURE ATESTATION

I, Jason de Bretteville, attest pursuant to Northern District Local Rule 5-1(h)(3) that all other signatories to this document, on whose behalf this filing is submitted, concur in the filing's content and have authorized this filing. I declare under penalty of perjury that the foregoing is true and correct.

Dated: April 21, 2025

/s/ Jason de Bretteville
Attorney for Defendant Public Resources
Advisory Group, Inc.